

UniFirst Corporation
15 Olympia Avenue
P.O. Box 4017
Woburn, Massachusetts 01888
Telephone (617) 933-5800

Gubeher

Site: Wells G & H
Break: 11.9
Other: UniFirst

548886

April 11, 1988

1st

Ms. Barbara Newman
Project Manager
U.S. Environmental Protection Agency
Massachusetts Superfund Section
Waste Management Division
J.F.K. Federal Building, HRS-CAN2
Boston, Massachusetts 02203



SDMS DocID

548886

Dear Ms. Newman:

I am responding to EPA's request to the Croatti Family Partnership for information pertaining to the Wells G & H Superfund site in Woburn, Massachusetts. That request was submitted to Mr. Aldo Croatti, as Chief Executive Officer of the UniFirst Corporation and a partner in the Croatti Family Partnership.

First, I would like to state that Aldo Croatti is not, nor has he ever been, a Partner in the Croatti Family partnership. The Croatti Family partnership, which was dissolved in 1986, consisted of the following partners: Ronald Croatti, Cythia Brown, Frederick Croatti, and Mona Levinstein. Second, the Croatti Family Partnership does not own the property located at 15 Olympia Avenue, Woburn, Massachusetts (the "property"). A brief description of the ownership history of the property is provided below.

In the mid-1960's, B & S Realty Trust purchased the property at 15 Olympia Avenue. The property was undeveloped at the time and was reportedly being used as a pig farm. Trustees of the B & S Realty Trust included Aldo Croatti, and Augusta Barra. In or about 1981, Aldo Croatti became sole trustee of B & S Realty Trust. In 1983, B & S Realty Trust sold the property to the Croatti Family Partnership and the Trust was dissolved.

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The Croatti Family Partnership continued leasing the property to UniFirst Corporation until 1986. In 1986, the Croatti Family Partnership sold the property to UniFirst and subsequently liquidated. Thus, the current owner and operator of the property, and the only surviving legal entity, is UniFirst.

The following additional information is being provided upon consultation with John Bartlett, Senior Vice-President of UniFirst, and Aldo Croatti. As B & S Realty Trust, and the Croatti Family Partnership are no longer in existence, the answers are not, strictly speaking, representations of the Croatti Family Partnership or B & S Realty Trust.

Questions numbered 4, 6, 9, 12, 13, 14, 16, 18, 19, 20, 21, and 22 pertain to operations at the facility, alleged releases of hazardous substances, and remedial action. B & S Realty Trust and the Croatti Family Partnership were at no time engaged in operation of the facility or the purchase, storage, or treatment of hazardous substances, or environmental investigations, or investigatory or remedial action. UniFirst responded to an EPA Request for Information containing similar questions on February 19, 1987 and supplemented its response on February 25, 1987. UniFirst has produced other documents pertaining to these matters in documents generated pursuant to the 1983 and 1987 consent agreements.

Question number 11 requests information regarding the physical characteristics of the facility. Such information has been produced by UniFirst pursuant to your January 29, 1987 Request for Information, along with well maps that were submitted to you as part of the Project Operation and Investigation Plan ("POIP") on August 19, 1987.

Question number 15 requests information on whether the Croatti Family Partnership had knowledge of releases or potential releases of hazardous substances at the facility. The Croatti Family Partnership was not aware of any releases or potential releases of hazardous substances when it purchased the property from B & S Realty Trust in 1983. Nor was B & S Realty Trust aware of any releases or potential releases prior to its purchase of the property in 1965 or 1966. In 1986, when the Croatti Family Partnership sold the property to UniFirst Corporation, the presence of potential releases was known to UniFirst, the operator of the facility, and was reflected in the purchase price of the property.

Question 23 requests that the respondent identify all liability insurance policies. B & S Realty Trust and the Croatti Family Partnership are named insureds on insurance policies purchased by UniFirst. Liberty Mutual, located at 175

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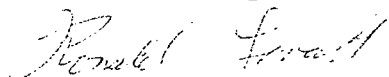
Berkeley Street, Boston, Massachusetts provided general liability coverage beginning in the early 1970's and continuing through 1988. In 1979, the year in which EPA discovered contamination of Wells G & H and discontinued use of those wells, Liberty Mutual provided property damage general liability coverage in the amount of \$250,000. Liberty Mutual has acknowledged coverage under its general liability policy and has exhausted its primary coverage limits.

Pacific Employers Insurance Company, a member of the CIGNA Insurance Company Group and represented by Michael F. Aylward of Morrison, Mahoney & Miller, 250 Summer Street, Boston, MA 02210, provided excess or umbrella coverage in the amount of \$5,000,000 for 1979. CIGNA is currently refusing to pay for ongoing and further and remedial work undertaken by UniFirst at Wells G & H. UniFirst is aggressively attempting to resolve the insurance dispute and to secure umbrella coverage. Meanwhile, UniFirst is continuing to carry out the work recommended by its consultants.

Questions numbers 24 and 25 request financial information for the Croatti Family Partnership. As noted above, the Croatti Family Partnership and B & S Realty Trust are no longer in existence and have no current assets. In question numbers 27 through 29 you request corporate documents pertaining to the Partnership. As noted above, the Partnership and the Trust have been dissolved. Neither was a subsidiary or parent corporation to UniFirst and there are no current trustees, partners, or shareholders of the Croatti Family Partnership or B & S Realty Trust.

In sum, B & S Realty Trust and the Croatti Family Partnership are prior owners of 15 Olympia Avenue, but did not at any time operate the facility or use, handle, store, or dispose of hazardous substances. UniFirst is the current owner and operator of the facility, and I believe that the data presently available to UniFirst management that is responsive to this request can be found in documents submitted to you pursuant to the 1983 consent order, the responses to your Request for Information issued January 29, 1987, and the POIP.

Very truly yours,



Ronald Croatti
Vice Chairman of the
Board of UniFirst Corporation
and former Partner of the
Croatti Family Partnership

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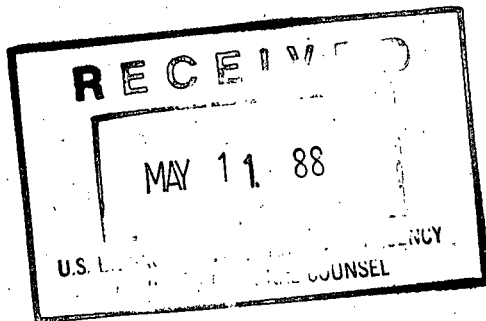
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